1998

JUL 17 1998

Mr. Jeff Saitas
Executive Director
Texas Natural Resource Conservation Commission
P. O. Box 13087
Austin, Texas 78711-3087

Dear Mr. Saitas:

I am pleased to inform you EPA Region 6 has approved the Texas Natural Resource Conservation Commission's (TNRCC) revision request to exempt portions of two aquifers for the purposes of uranium mining. These exemptions are specific to:

1) that portion of the Oakville Sandstone Formation, underlying approximately 842 acres, at a depth of 150 to 210 feet subsurface, ten miles south-southeast of the City of Bruni in Duval County, Texas (a. k. a. the Vasquez Project); and

2) that portion of the Goliad Formation, underlying approximately 70 acres, at a depth of 140 to 260 feet subsurface, 11 miles northwest of the City of San Diego in Duval County, Texas (a. k. a. the Rosita Project).

The areal extent of the Vasquez and Rosita projects' exemptions are specifically defined in the Uranium Resources Incorporated (URI) applications as initially conveyed by TNRCC to Region 6 on September 17, 1997, and February 4, 1998, respectively. The Rosita Project is an extension to an exemption approved by Region 6 in October, 1988. Region 6 has approved these exemptions as non-substantial revisions to the TNRCC's Underground Injection Control program.

These approvals are based upon the criteria stipulated in Title 40 of the Code of Federal Regulations §146.4; wherein a portion of an aquifer may be exempted if: (a) that portion does not currently serve as a source of drinking water; and (b) it cannot now and will not, in the future, serve as a source of drinking water, because the aquifer is mineral producing or can be shown to contain minerals that are expected to be commercially producible. The record shows that these criteria have been met.

These exemptions apply only to the injection of fluids into those portions of the Oakville Sandstone and Goliad Formations as proposed in the applications. Injection of other fluids (e. g. hazardous wastes) or injection of fluids into other formations that qualify as underground sources of drinking water would require additional approval.

RL 7/24/98

6WQ-SG:6/18/98:LEISSNER:RL:\L\TNRCC\aquifer.xmp\Vasrosit.xmp:FILE CODE WAT-6-6-9

New File

6WQ-SG DELLINGER
6WQ-S WRIGHT
6RC PACE

Permit Amendment and Exempted Aquifer Extension
URI, Inc. Rosita Mine, Permit Nº UR02880-001
Duval County, Texas

INFORMATION NEEDED ON AQUIFER EXEMPTION REQUESTS
CLASS III PROJECTS

1. A statement that the aquifer is not now used as a drinking source and cannot in the future serve as a drinking water source because it is mineral producing.

2. A written description of the proposed exemption including:

   a. Name of formation - **Goliad, page 1-1**

   b. Subsurface depth interval of Goliad sand (producing zone) **From 150'-300', found in 1986 application data.**

   c. Area of exemption- **54 acres added to mine area and 12.25 acres added to production area.**

   d. Vertical confinement from other underground sources of drinking water- **Clay and silt zone above and below Sand A (mine sand). There are cross-sections showing separation between Sand A and Sand B.**

   e. Thickness of proposed exempt zone- **10' to 70'.**

   f. Analyses of water from the proposed exempted aquifer- **Found in 1986 application data.**

   g. Direction and speed of regional and local groundwater flow- **Flow is to the south-southeast. Not enough hydrologic data to determine flow rate. Explanation for determination of groundwater flow found on page 48 and 49 of application submitted in 1986.**

   h. Mining schedule, including whether groundwater restoration would be required- **Found figure 8-1, 1986 application.**

   I. Major regional water supplies- There are none in the proposed exempt area. **Map with locations of domestic wells has been updated.**

   j Hydrologic testing of the proposed exempted aquifer which would demonstrate confinement from overlying and underlying aquifer- **Remains unchanged from**

the original application, 1986. New cross-sections were constructed that show clay-silt formation separating the A Sand and B Sand. A ring of monitoring wells surrounding the producing area will be drilled which will be used to monitor the aquifer fluids during the mining process.

** k. Summary of public participation (e.g. copy of public notice, major comments, response to comments, etc.) **NOT FOUND**

l. Mining process- **Same as found in 1986 application.**

m. Monitoring scheme to assure that injected fluids do not migrate from exempted aquifer- **Scheme is the same as in 1986 application. Revised map shows new monitoring well locations around proposed producing area.**

n. An estimate of the duration of the exemption if the exempted status will be removed- **Same time frame as in original application, 1986.**

3. Provide the following maps:

a. A USGS topographic map showing lateral limits of proposed exemption- **YES**

b. Map showing water supply wells within the exempted area and less than ¼ mile from the exempted area boundaries- **NO WELLS in area. Updated table and map shows no domestic wall wells in the proposed producing area.**

c. A map showing location of major regional water supply wells (e.g., community water supply wells, major irrigation wells, major industrial wells, etc) **Up to date map furnished which shows all water supply wells in area.**.

d. A map showing other artificial penetrations of the exempted formation within ¼ mile of the exempted aquifer boundaries (e.g. oil wells, dry holes etc.)- **Revised map shows no new wells within ¼ mile of exempted aquifer boundaries.**

e. A map of regional groundwater gradient, if available- **NOT Found**.

4. Provide the following tables;

a. A list of water supply wells is shown on the maps in "3.b" and "3.c" above. The table should include well depths, screened interval, use (e.g. irrigation, domestic, public supply, etc.) aquifer tapped, and approximate pumpage, if available- **Table 10-1(updated), Page 10-3 of application data.**

b. A list of artificial penetrations shown on the map in "3.d" above. The table should

show well depth, use, status (e.g. producing and abandoned, etc.) If appropriate- **Found in 1986 application. Table showing status of water wells in project area.**

c. Results of chemical analyses of formation water and, if available, injected fluids- **Found in 1986 application**.

5. a. A cross-section which shows the vertical limits if the proposed exemption, upper and lower confining layers, potential drinking water sources overlying and underlying the exempted aquifers, and names of geologic formations shown. The cross-section trace should be indicated on one of the maps provided- **These maps are found in the application under consideration.**

6. A copy of the draft operating permit- **Found with application data**